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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PETER SCHULTZ, individually and as trustee
of the SUNSHINE AND RAIN ASSET
MANAGEMENT IRREVOCABLE TRUST,

Plaintiff,

vs.

AMERICAN BATTERY TECHNOLOGY
COMPANY, INC. a Nevada Corporation;
ACTION STOCK TRANSFR COMPANY,
INC., a Utah Corporation, and DOES 1 to 10,
inclusive,

Defendants.

Case No. 2:22-cv-01965-JAD-EJY

**STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING TIME FOR DEFENDANT
AMERICAN BATTERY TECHNOLOGY
COMPANY, INC. TO RESPOND TO
PLAINTIFF PETER SCHULTZ'S
COMPLAINT**

[FIRST REQUEST]

Defendant American Battery Technology Company, Inc. ("ABTC"), by and through its attorneys, Dickinson Wright PLLC, and Plaintiff Peter Schultz, individually and as Trustee of the Sunshine and Rain Asset Management Irrevocable Trust (collectively "Schultz"), by and through his attorneys, Gordon Rees Scully Mansukhani, LLP, stipulate and agree as follows:

1. Schultz filed his Complaint [ECF 1] (the "Complaint") on November 22, 2022.
2. Schultz served ABTC on or about December 7, 2022.
3. ABTC's deadline to respond, move or otherwise plead to the Complaint is December 28, 2022.

4. Schultz and ABTC have agreed that ABTC shall have up to and including January 11, 2023, to respond, move or otherwise plead to the Complaint.

5. The request for an extension is because the current deadline falls in the middle of the holidays and ABTC needs additional time to review its records pertaining to the allegations in the Complaint.

6. This is the first stipulation between ABTC and Schultz to extend the time for ABTC to respond, move or otherwise plead to the Complaint and it is not being entered into for purposes of any delay.

Dated: December 22nd 2022.

Dated: December 22nd 2022.

**GORDON REES SCULLY
MANSUKHANI, LLP**

DICKINSON WRIGHT PLLC

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/s/: Gabriel A. Blumberg

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and Rain Asset Management Irrevocable Trust*

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: December 22, 2022